Megan J. DePaulis (12492) Salt Lake City Attorney's Office 451 S. State Street, Suite 505A P.O. Box 145478 Salt Lake City, Utah 84114-5478

Telephone: (801) 535-7788 Facsimile: (801) 535-7640

Email: Megan.DePaulis@slcgov.com

Counsel for Salt Lake City Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ROCKY MOUNTAIN POWER'S 2019 AVOIDED COST INPUT CHANGES QUARTERLY COMPLIANCE FILING

Docket No. 19-035-18

PETITION TO INTERVENE OF SALT LAKE CITY CORPORATION

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, Petitioner Salt Lake

City Corporation ("Petitioner" or "City") hereby petitions for leave to intervene in this docket.

In support of this petition, Petitioner states as follows:

- 1. Petitioner is a Utah municipal corporation serves the interests of a large number of citizens who are customers of Rocky Mountain Power ("RMP").
- 2. The legal rights and interests of Petitioner and its citizens may be substantially affected by this proceeding.

- 3. Petitioner has not fully determined the specific positions it will take or the relief it will seek. Petitioner seeks to intervene for the purposes of protecting its interests and the interests of its citizens as they may appear.
- 4. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene.
- 5. Petitioner's interests are not adequately represented by another party in this proceeding.
 - 6. Notices in this proceeding should be sent to the following:

Megan J. DePaulis Salt Lake City Attorney's Office 451 S. State Street P.O. Box 145478 Salt Lake City, Utah 84114-5478 Telephone: (801) 363-6363

Facsimile: (801) 363-6363

Email: megan.depaulis@slcgov.com

Christopher Thomas
Salt Lake City Department of Sustainability
451 S. State St. Room 404
P.O. Box 145467
Salt Lake City, UT 84114-5467
(801) 535-7259
(385) 228-6873
christopher.thomas@slcgov.com

WHEREFORE, the City requests leave to intervene in this proceeding to protect its interests as they may appear.

DATED this 9th day of April 2020.

SALT LAKE CITY CORPORATION

/s/ _Megan J. DePaulis ____ Attorney for Salt Lake City Corporation

Certificate of Service **Docket No. 19-035-18**

I hereby certify that a true and correct copy of the foregoing was served by email this day 9th day of April 2020 on the following:

PACIFICORP

Data Request Response Center datareq@pacificorp.com

utahdockets@pacificorp.com

ROCKY MOUNTAIN POWER

Jana Sabajana.saba@pacificorp.comEmily Wegeneremily.wegener@pacificorp.comJoelle Stewardjoelle.steward@pacificorp.com

UTAH CLEAN ENERGY

Hunter Holman hunter@utahcleanenergy.org
Kate Bowman kate@utahcleanenergy.org

SALT LAKE CITY

Megan J. DePaulis megan.depaulis@slcgov.com

Counsel for Salt Lake City Corporation

Christopher Thomas christopher.thomas@slcgov.com

ASSISTANT UTAH ATTORNEYS GENERAL

Patricia Schmid pschmid@agutah.gov
Justin Jetter jjetter@agutah.gov
Robert Moore rmoore@agutah.gov
Victor Copeland vcopeland@agutah.gov

DIVISION OF PUBLIC UTILITIES

Madison Galt mgalt@utah.gov

OFFICE OF CONSUMER SERVICES

Cheryl Murray cmurray@utah.gov

/s/ Christopher Thomas